

STARR, GERN, DAVISON & RUBIN

A PROFESSIONAL CORPORATION

COUNSELLORS AT LAW  
105 EISENHOWER PARKWAY  
SUITE 401

ROSELAND, NEW JERSEY 07068-1640

TEL (973) 403-9200

FAX (973) 226-0031

WWW.STARRGERN.COM

EDWIN S. RUBIN (1929-2017)  
RONALD L. DAVISON  
AMOS GERN\*†  
IRA M. STARR°  
JONATHAN J. LERNER\*^  
NICHOLAS STEVENS°^ (1964-2018)  
STEPHEN R. URBINATO□

JOHN T. BROST\*  
ALONA MAGIDOVA\*^  
RICHARD T. WELCH\*  
HENRY J. CISTRELLI  
L. JUSTINE JURICK\*<  
DAVID WENDEL  
STEWART J. MILLER  
ANA RITA FERREIRA\*

COUNSEL TO THE FIRM  
LARRY M. COLE

OF COUNSEL

BRUCE M. PITMAN\*^  
CHARLES F. VUOTTO, JR.^◇  
DONALD S. GOLDMAN^  
SHELLEY L. STANGLER\*  
LYNN B. NORCIA^  
CATHYANNE A. PISCIOTTA•

\* MEMBER NJ & NY BAR  
◊ MEMBER NJ & DC BAR  
□ MEMBER NJ & PA BAR  
< MEMBER NJ & TX BAR  
† CERTIFIED BY THE  
SUPREME COURT OF  
NEW JERSEY AS A  
CIVIL TRIAL ATTORNEY  
◇ CERTIFIED BY THE SUPREME  
COURT OF NEW JERSEY AS A  
MATRIMONIAL LAW ATTORNEY  
^ N.J.Ct.R. 1:40  
QUALIFIED MEDIATOR  
• LL.M. IN TAXATION

July 27, 2022

**BY ELECTRONIC FILING**

Magistrate Judge José R. Almonte  
United States Magistrate Judge for the District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street, Room PO 9  
Newark, NJ 07101

**Re: Garreffi v. Hicks, *et al.***  
**Case No: 2:20-cv-16396-MCA-MAH**

Dear Judge Almonte:

The parties submit this status letter in anticipation of the conference August 10, 2022. On June 27, 2022 the Court issued its Order and Opinion on the Rule 12(b)(6) Motion [DE 62]. Although permission was given to amend the Second Amended Complaint as to Count VII, the civil conspiracy count dismissed Without Prejudice, plaintiff has determined not to file a further Amended Complaint at this time. On July 14, 2022 an Answer was filed by the eleven (11) defendants [63].

With the exception of service of the defendants' Rule 26 disclosures, no substantive discovery has yet been engaged in. The agreement to engage in discovery prior to the inclusion of all defendants and determination of the Motion would have resulted in re-answering of interrogatories and notice to produce at different junctures in the litigation. Counsel is prepared to proceed, have conferred and request the following schedule:

Written discovery including any Rule 26 disclosures to be propounded by August 30, 2022;

Written discovery to be answered by November 15, 2022;

Discovery disputes to be put before the Court in a joint letter by December 31, 2023;

Fact discovery to be completed by March 31, 2023;

A conference is to be scheduled for \_\_\_\_\_.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Shelley L. Stangler".

SHELLEY L. STANGLER, ESQ.

SLS/mf

Enc.

cc: Chanell Marie Branch, DAG, via email: [Chanell.Branch@law.njoag.gov](mailto:Chanell.Branch@law.njoag.gov)